

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

BERGSTROM, INC.,)	
)	
Plaintiff,)	
)	Case No. 3:08-cv-50078
v.)	
)	
GLACIER BAY, INC.,)	Hon. Frederick J. Kapala, U.S.D.J.
)	Hon. P. Michael Mahoney, U.S.M.J.
Defendant.)	
)	

**AGREED MOTION FOR AN INITIAL EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b) and Judge P. Michael Mahoney's standing order, Defendant Glacier Bay, Inc. ("Glacier Bay"), without waiving any defenses or any matters that might be presented pursuant to Federal Rule of Civil Procedure 12(b), hereby moves this Court to extend the period of time to answer or otherwise plead in response to Plaintiff Bergstrom Inc.'s Complaint an additional 60 days, or until July 28, 2008. Defendant Glacier Bay was served on May 7, 2008, and the date to answer or otherwise plead is May 27, 2008. Glacier Bay submits that the extension of time until July 28, 2008, is requested in order to allow Defendant an opportunity to explore potential settlement between the parties. By way of an email dated May 16, 2008, Plaintiff's counsel, David G. Hanson, agreed to the extension of 60 days.

Pursuant to the Court's instructions, a proposed order is submitted via electronic mail to Proposed_Order_Mahoney@ilnd.uscourts.gov.

Dated: May 21, 2008

Respectfully submitted,

/s/ Andrea M. Augustine

Andrea M. Augustine
FOLEY & LARDNER LLP
321 North Clark Street, Suite 2800
Chicago, IL 60610-4764
Telephone: 312.832.4500
Facsimile: 312.832.4700
aaugustine@foley.com

Michael D. Kaminski
FOLEY & LARDNER LLP
3000 K Street, N.W., Suite 500
Washington, D.C. 20007-5109
Telephone: 202.672.5300
Facsimile: 202..672.5399
mkaminski@foley.com

ATTORNEYS FOR DEFENDANT
GLACIER BAY, INC.

Certificate of Service

I, Andrea M. Augustine, an attorney, hereby certify that on May 21, 2008, the foregoing Agreed Motion for an Initial Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint was filed with the Clerk of Court using the CM/ECF system, which will send an electronic copy of the foregoing to David G. Hanson at dhanson@reinhardtllaw.com, counsel for plaintiff Bergstrom, Inc.

/s/ Andrea M. Augustine
Andrea M. Augustine